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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

SEP 8 1995

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Amendment of the) PR Docket No. 92-257
Commission's Rules)
Concerning Maritime)
Communications)

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To: The Commission

CORRECTION AND CLARIFICATION

On August 9, 1995, the Industrial Telecommunications Association, Inc. ("ITA") filed a Petition for Reconsideration of the First Report and Order in the above-referenced proceeding.¹

In its Petition for Reconsideration, ITA included two attachments intended to depict situations in which the HAAT (Height Above Average Terrain) was considerably in excess of 122 meters (400 feet) while the antenna height (above mean sea level) was less than 122 meters. These two attachments purported to relate to locations in Denver, Colorado and Greeley, Colorado.

The point that ITA was seeking to demonstrate with these attachments was that there are locations in the United States where, due to extremely severe variations in topography, the HAAT is greatly in excess of the 400 foot maximum represented in the

¹ First Report and Order (FCC 95-178), adopted April 26, 1995, released May 26, 1995, summary published at 60 Fed. Reg. 35,507 (August 9, 1995).

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matrix contained in Section 90.283(d) of the rules. ITA contended that, for such situations, the height of the antenna above mean sea level represents a more appropriate consideration than HAAT.

In fact, the attachments submitted with the Petition for Reconsideration were inadvertently based on geographic coordinates that fall outside the state of Colorado. With the instant filing, ITA is submitting corrected attachments that depict the actual geographic coordinates and HAAT for antenna sites in Denver, Colorado and Greeley, Colorado. In ITA's view, the corrected attachment for Greeley does demonstrate the difficulty posed by locations having extreme variations in topography.

The intent underlying ITA's Petition for Reconsideration was simply to avoid situations in which extreme variations in topography would necessitate requests for waiver of the matrix contained in Section 90.283(d). ITA is aware, however, that, in the view of some interested parties, antenna height is not appropriate for use in the matrix. These parties would prefer retention of HAAT in the matrix.

ITA believes the concerns of these parties, as well as ITA's own concerns, would be adequately addressed if the matrix were amended to permit HAAT's in excess of 400 feet without any increase in the permissible ERP levels. In other words, with

this suggested alternative, an applicant could be licensed for an HAAT in excess of 400 feet, without waiver, as long as the applicant's ERP did not exceed 400 watts. ITA would accomplish this change by deleting the last entry in the HAAT column in the matrix ["122 (400)"] and substituting an entry that reads "122 (400) or more".


ITA believes the change outlined above may represent a more universally acceptable alternative to the use of height above mean sea level and therefore submits this alternative for the Commission's consideration.

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By:


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Dated: September 8, 1995

Attachments

Client: ITA

Site: BALD MTN. (DENVER, CO)

Ground Elevation: 13684 Ft AMSL

Antenna Height: 100 Ft AGL

Coordinates: N 39 49 55
W 104 55 4

Radial	Average Terrain
0.0	5162.1
45.0	5112.0
90.0	5260.5
135.0	5328.3
180.0	5328.2
225.0	5222.5
270.0	5331.9
315.0	5294.0

Average: 5254.9 Ft AMSL

AZ (deg)	HAAT (ft)
0.0	8622
45.0	8672
90.0	8523
135.0	8456
180.0	8456
225.0	8561
270.0	8452
315.0	8490

Average: 8529.1 Ft HAAT

Client: ITA

Site: GREELEY, CO

Ground Elevation: 4820 Ft AMSL

Antenna Height: 50 Ft AGL

Coordinates: N 40 25 55
W 104 41 32

Radial	Average Terrain
0.0	4816.1
45.0	4737.6
90.0	4628.1
135.0	4691.6
180.0	4699.5
225.0	4783.9
270.0	4785.4
315.0	4786.3

Average: 4741.2 Ft AMSL

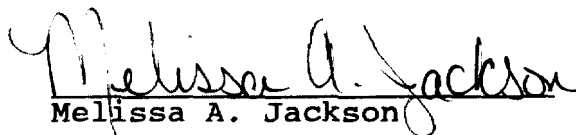
AZ (degs)	HAAT (ft)
0.0	54
45.0	132
90.0	242
135.0	178
180.0	170
225.0	86
270.0	85
315.0	84

Average: 128.9 Ft HAAT

CERTIFICATE OF SERVICE

I, Melissa A. Jackson, do hereby certify that on the 8th day of September 1995, I forwarded to the parties listed below a copy of the foregoing "Correction and Clarification" by first-class mail, postage pre-paid:

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Melissa A. Jackson